



# California Fair Political Practices Commission

October 3, 1986

Ms. Jan M. Brunken  
Treasurer, O'Melveny & Myers Political  
Action Committee  
400 South Hope Street  
Los Angeles, CA 90071-2899

RE: Your Request for Advice  
Our File No. I-86-254

Dear Ms. Brunken:

Thank you for your letter of August 6, 1986, requesting advice concerning political action committee contributions to candidates and measures being voted upon in other states.

## QUESTION

May a political action committee registered in California make contributions in support of and in opposition to candidates and measures being voted upon in other states?

## CONCLUSION

A political action committee registered in California may make contributions to candidates and measures being voted upon in other states.

## FACTS


In addition to supporting various California candidates and measures, the O'Melveny & Myers Political Action Committee (a registered California committee) also makes contributions in support of and in opposition to candidates and measures being voted upon in other states. You have been advised by various members of the Commission's staff that this activity is a permissible use of campaign funds under California law and that the expenditures must be reported on the committee's campaign disclosure statements. You have asked that the Commission confirm this past advice in writing.

ANALYSIS

Chapter 5 of Division 9 of the Elections Code (Section 12400 et seq.) limits the permissible uses of campaign funds. Use in out-of-state campaigns is not prohibited. If you have any additional questions concerning the permissible uses of campaign funds, I suggest you contact the State Attorney General's Public Inquiry Unit at its toll-free number: 800/952-5225.

Sincerely,

Diane M. Griffiths  
General Counsel

By   
Mary Ann Kvasager  
Political Reform Consultant

DMG:MAK:cah

1800 M STREET, N.W.  
WASHINGTON, D. C. 20036-5857  
TELEPHONE (202) 457-5300  
TELEX 89-622 (202) 833-3672 (DDD)

680 FIFTH AVENUE  
NEW YORK, NEW YORK 10019  
TELEPHONE (212) 247-4040  
TELEX 127008

WRITER'S DIRECT DIAL NUMBER

O'MELVENY & MYERS

400 SOUTH HOPE STREET  
LOS ANGELES, CALIFORNIA 90071-2899  
TELEPHONE (213) 669-6000  
TELEX 67-4122 • 4997795 (DDD)

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1800 CENTURY PARK EAST  
LOS ANGELES, CALIFORNIA 90067-1589  
TELEPHONE (213) 553-6700  
TELEX 67-4097  
610 NEWPORT CENTER DRIVE  
NEWPORT BEACH, CALIFORNIA 92660-6429  
TELEPHONE (714) 760-9600 • (213) 669-6000  
TELEX (714) 720-1397 (DDD) • 4722088 (ITT)

OUR FILE NUMBER

637,385-411

Robert Leidigh, Esq.  
Fair Political Practices Commission  
428 J Street  
Sacramento, CA 95814

Dear Mr. Leidigh:

I am the Treasurer of the O'Melveny & Myers Political Action Committee (No. 802120) (the "OM&M PAC"), a recipient committee under California law. The OM&M PAC receives contributions from O'Melveny & Myers, a law firm, and makes expenditures supporting various California candidates and measures. I have been told by various persons at the Fair Political Practices Commission that the OM&M PAC may expend its contributions in support of or opposition to candidates and measures on the election ballot in states other than California or candidates on the election ballot for a national office. I recognize that such expenditures would continue to be subject to the disclosure provisions of California law, as well as federal or applicable state law. I was told that I could request an opinion from you to that effect.

Please direct your opinion on this matter to my attention at the above-named address. If you have any questions, feel free to give me a call.

Sincerely,



Jan M. Brunken  
Treasurer  
of the O'Melveny & Myers  
Political Action Committee

JMB:jh